

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
In re : Chapter 11
:
DELPHI CORPORATION, et al., : Case No. 05-44481 (RDD)
:
Debtors. : (Jointly Administered)
:
----- X

Robert J. Patton hereby declares as follows:

1. I am the General Counsel, Commercial Legal Affairs, for Temic Automotive of North America, Inc. (“Temic”). I make this declaration in support of the Objection¹ of Temic and Motorola, Inc. to the Debtors’ Expedited Motion to Strike (I) Non-Conforming Cure Amount Notices and (II) Improper Objections Pursuant to Solicitation Procedures Order, Confirmation Order, Plan of Reorganization, 11 U.S.C. § 105(a), and Fed. R. Bankr. P. 9010 filed in the above-captioned bankruptcy case. I have personal knowledge of the matters set forth herein.

Plan Cure Notice

2. On February 14, 2008, Temic learned that a cure notice in connection with certain contracts being assumed under the Debtors’ plan of reorganization (the “Plan Cure Notice”) had purportedly been served by the Debtors upon Temic. However, Temic did not receive any such notice.

3. The Plan Cure Notice was purportedly sent to (i) Temic Automotive of North EFT, 4000 Commercial Avenue, Northbrook, Illinois, 60062, USA (“Address 1”) and (ii) Temic

¹ All terms not otherwise defined herein shall have the meaning ascribed to them in the Objection.

Automotive of North EFT 1, Patricio Lote 6, Parq Ind San Carlo, Nogales, SON, 84090, Mexico (“Address 2”).

4. Address 1 is the address of one of Temic’s small laboratories where there is no office personnel. Address 2 is the address of Temic’s manufacturing plant in Mexico.

5. The actual address for Temic’s headquarters is 21440 West Lake Cook Rd., Deer Park, Illinois 60010.

6. Both copies of the Plan Cure Notice were purportedly addressed solely to a company name and not directed to any particular person such as the President or General Counsel for Temic.

Notice

7. The Debtors also sent their Notice of Cure Amount With Respect To Executory Contract or Unexpired Lease to be Assumed and Assigned in Connection With Sale of Steering and Halfshaft Business (the “Notice”) to 37101 Corporate Dr., Farmington Hills, Michigan 48331, which is the old address of one of Temic’s offices. This office was closed months ago and a new tenant is now renting the space.

8. The Notice was addressed solely to a company name and not directed to any particular person such as the President or General Counsel for Temic.

9. The Notice was ultimately delivered to Temic's internal counsel in Deer Park, Illinois at Temic's corporate headquarters. It is interesting to note that the Plan Cure Notice was not delivered to the Farmington Hills address albeit a stale address.

10. For all the foregoing reasons, the Objection should be sustained.

19th Day of February, 2008

/s/ Robert J. Patton

Robert J. Patton, Esq.
General Counsel, Commercial Legal Affairs
Temic Automotive of North America, Inc.